

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 13-10200-GAO
	)	
DZHOKHAR TSARNAEV	)	

**JOINT MOTION FOR EXTENSION OF DEADLINE RE:  
JOINT LISTING OF DOCKET ENTRIES THAT SHOULD  
BE UNSEALED AND SUPPORTING BASIS FOR CONTINUED SEALING**

The defendant, Dzhokhar Tsarnaev, and the United States, by and through counsel, respectfully request the Court to extend the deadline regarding disputed docket entries by two weeks, to March 28, 2016.

On January 25, 2016, the parties submitted a 22-page list of approximately 621 documents both parties agreed should be unsealed. [DE 1626]. At the parties' request, the Court has twice granted additional time, most recently to February 29, 2016, for the parties to review and discuss the remaining documents. [DE 1623, 1638]. A third motion to extend the time for filing until March 14, 2016 is pending. [DE 1640].

The parties have developed and traded rationales for their respective positions regarding the remaining docket entries and have drafted portions of the chart as directed by the Court. As the result of that continuing exercise, the parties are optimistic that they can resolve their disputes regarding additional docket entries and so reduce the list of entries that require ruling by the Court. The review continues, however, and the parties require a brief additional period of time to come to final resolution. The parties request

an additional two-week period to produce the “chart setting forth each disputed docket entry by docket number and document title, the supporting party’s basis for continuing the seal, and the opposing party’s response.” D.E. 1605.

The parties therefore jointly request the Court extend the deadline for submitting the chart setting forth disputed docket entries to March 28, 2016.

Respectfully submitted,

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DZHOKHAR TSARNAEV

By his attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 14, 2016.

/s/ Timothy G. Watkins